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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

29 JPMORGAN CHASE BANK, N.A.,

30 Plaintiff,

31 vs.

32 SFR INVESTMENTS POOL 1, LLC, a
33 Nevada limited liability company;
34 TRAIL RIDGE COMMUNITY
35 ASSOCIATION, a Nevada non-profit
36 corporation; LIZZY HOLBROOK, an
37 individual.

38 Defendants.

39 Case No. 2:17-CV-00334-RFB-PAL

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1 Pursuant to LR IA 6-1 and LR 26-4, Plaintiff/Counter-Defendant JPMorgan
2 Chase Bank, N.A. (“Chase”), Defendant/Counterclaimant/Cross-Claimant SFR
3 Investments Pool 1, LLC (“SFR”), and Defendant Trail Ridge Community Association
4 (“Trail Ridge”),¹ by and through their respective counsel of record, stipulate and
5 request that this Court extend discovery and dispositive motion deadlines in the
6 above-captioned case for 30 days, to permit the parties to efficiently complete party
7 depositions and outstanding written discovery. The parties have conferred and agree
8 that this brief extension is the most reasonable, most economical, and least
9 burdensome way to complete discovery in this case.

10 This is the parties’ first request for an extension to the scheduling order
11 deadlines, which were submitted in compliance with LR 26-1. The parties make this
12 request in good faith and not for purposes of delay.

13 **A. Discovery Completed to Date**

14 To date, Chase has served the following discovery: initial disclosures; initial
15 expert disclosure; requests for production to SFR; interrogatories to SFR; notice of
16 Rule 30(b)(6) deposition of SFR; requests for production to Trail Ridge;
17 interrogatories to Trail Ridge; notice of Rule 30(b)(6) deposition of Trail Ridge;
18 subpoena to produce documents on non-party Alessi & Koenig, LLC; and subpoena to
19 testify at a deposition on non-party Alessi & Koenig, LLC.

20 To date, SFR has served the following discovery: initial disclosures.

21 To date Trail Ridge has served the following discovery: initial disclosures.

22 **B. Specific Description of Discovery that Remains to be Completed**

23 Chase is awaiting responses to the discovery requests it served, and SFR
24 anticipates that it will soon be serving discovery requests upon Chase. In addition,
25

26 ¹ Although Defendant/Cross-Defendant Lizzy Holbrook waived service of the
27 Summons and Complaint in this litigation (see ECF No. 7), Ms. Holbrook has not
otherwise appeared, and therefore, this stipulation and order is submitted without
her signature.

1 they are working to schedule party and non-party depositions. Chase has scheduled
2 the deposition of non-party Alessi & Koenig, LLC for November 27, 2017 and of
3 Defendant Trail Ridge for November 28, 2017 and of Defendant SFR for November
4 29, 2017. SFR has also noticed a Rule 30(b)(6) deposition of Chase. As discussed
5 below, however, the parties seek to schedule Chase's deposition and to reschedule to
6 occur after the current discovery cutoff of November 29, 2017.²

7 **C. Good Cause Exists for the Requested Extension**

8 Good cause exists for the requested extension, as it will provide time for the
9 parties to complete written discovery and schedule depositions in a way that
10 minimizes burden and increases efficiency. SFR has noticed Chase's deposition for
11 November 29, 2017, but Chase's Rule 30(b)(6) designee is unavailable on this date
12 because the designee will be testifying in five other depositions in similar lawsuits
13 involving Chase and SFR, on not only November 29 but also on November 28 and 30.
14 The parties have met and conferred about rescheduling Chase's deposition in this
15 lawsuit to take place during the week of December 11-15, 2017, when the Chase
16 designee will be available and again in Las Vegas. This approach will significantly
17 minimize the cost and burden to the witness. This is the parties' first request to
18 extend the standard, 180-day discovery period in this case, and they seek only a brief
19 30-day extension. The parties have diligently engaged in discovery to date and seek
20 this extension in good faith.

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27 ² The parties further reserve their rights to meet and confer and, if necessary, engage
in motion practice regarding any discovery issues that may arise.

28

1 **D. Proposed Discovery Deadlines**

2 The parties request an order extending the close of discovery, the deadline to
3 file dispositive motions, and the deadline to file a pre-trial order by 30 days.

4 Event	5 Current Deadline³	6 New Deadline
7 Close of Discovery	8 November 29, 2017	9 December 29, 2017
10 Dispositive Motions	11 December 29, 2017	12 January 29, 2018
13 Pre-Trial Order	14 January 29, 2018	15 March 1, 2018

16 *[continued on next page]*

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27 ³ See Scheduling Order, ECF No. 24.
28

1 This extension is reasonable and necessary given the good cause set forth
2 above.

3 **IT IS SO STIPULATED.**

4 Dated: November 8, 2017

5 BALLARD SPAHR LLP

KIM GILBERT EBRON

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26 Las Vegas, Nevada 89117

27 *Attorneys for Trail Ridge Community
28 Association*

29 **ORDER**

30 **IT IS SO ORDERED:**

31 
32 UNITED STATES MAGISTRATE JUDGE

33 DATED: November 14, 2017

CERTIFICATE OF SERVICE

I hereby certify that on November 8, 2017, a true copy of the foregoing
STIPULATION AND ORDER TO EXTEND SCHEDULING ORDER DEADLINES
BY 30 DAYS was served via U.S. Mail, postage-pre-paid on the following:

Lizzy Holbrook
9220 Red Knoll
Las Vegas, Nevada 89113

/s/ Mary Kay Carlton
An Employee of Ballard Spahr LLP

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